

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

United States of America,
Plaintiff,

v.

Dennis E. Hecker,
Defendant.

Case No. 0:10-CR-32 (01) JNE/SRN

**DEFENDANT'S MOTION FOR
EARLY COMPLIANCE WITH THE
JENCKS ACT**

Defendant, DENNIS E. HECKER, by and through his undersigned counsel, Brian N. Toder, hereby moves the Court for an order requiring early compliance with Federal Rules of Criminal Procedure and the Jencks Act, 18 U.S.C. 3500, specifically Rules 16 and 26.2. Given the large numbers of potential government witnesses, early compliance, no less than 30 days before trial, is necessary to provide defense counsel adequate time to review the requested information, prepare for meaningful cross examination and to ensure that defendant's Constitutional right to effective assistance of counsel is maintained.

This motion is based upon the indictment, the records and files in the above-entitled action, the concurrently filed memorandum, and any and all other matters which may be presented prior to or at the time of hearing of said motion.

Respectfully submitted,

Dated: June 8, 2010

CHESTNUT CAMBRONNE PA

By /s/ Brian N. Toder

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